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March 11, 2021

VIA ELECTRONIC MAIL ONLY

The Honorable Susan Richard Nelson
United States District Court Judge
District of Minnesota
316 N. Robert Street
St. Paul, MN 55101
Nelson_chambers@mnd.uscourts.gov

Re: *Kaarin Nelson Schaffer, as Trustee for the Next of Kin of George P. Floyd, Jr., Deceased v. Derek Chauvin, et al.*, Case No. 20-CV-01577 (SRN/TNL) – Request for Extension of Time to Respond

Your Honor:

On March 4, 2021, counsel for Individual Defendants Derek Chauvin, Tou Thao, Thomas Lane, and J. Alexander Kueng filed a motion to further extend a stay of these proceedings pending the outcome of parallel criminal cases against Defendants. [*See* ECF Nos. 53-57]. The current stay expires on April 1, 2021. Per District of Minnesota LR 7.1(b) and based on an available hearing date they secured for March 19, 2021, Defendant needed to file their motion March 4th and Plaintiff's response is due March 11, 2021. Plaintiffs write with the support of all parties in this action to request an extension of time to respond to this motion or, in the alternative, that the court reset the hearing for a later available date.

Obviously, this case and the parallel criminal cases have been the subject of considerable attention and activity over the last week. All parties in this matter recognize that additional time to evaluate the changing landscape will likely allow us to reach an agreement regarding the extension of the stay and eliminate the need for additional briefing and a hearing.

Accordingly, Plaintiffs request an extension of time until March 17, 2021 to respond to Defendants' motion or, in the alternative, resetting the hearing at a later date convenient for the Court. Regardless of when the motion is heard, the parties agree that the current stay will be effective until the Court decides the pending motion.

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Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "Michelle Gilboe". The signature is written in a cursive, flowing style.

Michelle Gilboe

cc: All Counsel of Record